

REMARKS

This paper is in response to the Office Action of March 12, 2007. A one month extension is respectfully requested.

Claims 1, 3-7 and 17-20 were rejected under 35 USC § 103(a) as being unpatentable over Satoh et al. (US Pat. No. 5,979,475), in view of Japan '828.

The rejection by the Office is respectfully traversed. As discussed in the prior office action response, Satoh et al. defines a system (with reference to Figures 20A, 20B, and 21), which sprays on fluids to the surface of the wafer. This spraying apparatus is different from the apparatus, as now claimed, that generates a fluid meniscus between a surface of a manifold module and the surface of the substrate.

The structural position of the surface of the module surface and the surface of the substrate is such that the fluid meniscus is *contained between the surfaces*. Each of the independent claims have been amended to more clearly define this feature. Consequently, the teachings of Satoh et al., which relies on the spray, combined with Japan '829, which does not define structure for containing a meniscus, would not suggest the now claimed invention. Japan '828 teaches a single head, with conduits for delivering and removing fluids from particular spots, which are *splashed* onto the wafer 1.

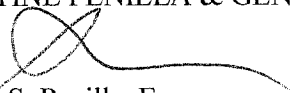
Additionally, as noted in the last response, the manifold carrier for positioning the first manifold module is incorporated into independent claims 1 and 17. This feature was previously presented as dependent claim 2, and the Applicants do not find any teaching in Satoh et al. regarding this element. The Office points to Figure 21, however, item 90a is not a manifold module, nor does it include a second manifold module that connects to a first manifold module. The Applicant's review of Figure 21 of Satoh et al., and as noted in col. 26, defines a system for moving wafers using a robot and robot arm 90a. The Office is respectfully requested to refer to col. 26 and the referenced Figure 21, to notice that the structure defined by Satoh et al. is not analogous, nor structurally defined as claimed and amended. Accordingly, the Office is respectfully requested to withdraw this rejection.

If the Examiner wishes to discuss the remarks or needs clarification on any point, the Examiner is kindly urged to contact the undersigned by phone at (408) 749-6903.

A Notice of Allowance is respectfully requested.

If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No LAM2P475). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
MARTINE PENILLA & GENCARELLA, LLP



Albert S. Penilla, Esq.
Reg. No. 39,487

710 Lakeway Drive, Suite 200
Sunnyvale, CA 94085
Telephone: (408) 749-6900
Facsimile: (408) 749-6901